

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA

v.

Criminal No. 2:24-00129

DONALD A. ENNIS

DEFENDANT'S MOTION TO MODIFY BOND CONDITIONS

The defendant, Donald A. Ennis, by his attorney, Assistant Federal Public Defender Rachel E. Zimarowski, moves this Court to modify the conditions of his bond to permit him to travel to the Northern District of West Virginia as necessary for work. In support of this motion, the defendant states as follows:

1. Mr. Ennis is currently on bond under the standard terms and conditions for release in this district. Dkt. No. 12. Condition No. 7(f) restricts his travel to the Southern District of West Virginia. *Id.*

2. Mr. Ennis is currently employed as a Mobile Critical Care Paramedic, and he is occasionally tasked with transporting patients to hospitals in the Northern District of West Virginia, including but not limited to J.W. Ruby Memorial Hospital in Morgantown, West Virginia.

3. Mr. Ennis asks the Court to modify Condition 7(f) of his bond to permit him to travel to the Northern District of West Virginia as necessary for work.

4. Counsel has discussed the reasons for this Motion with Assistant United States Attorney Erik S. Goes, who indicated that the government has no objection to this Motion.

WHEREFORE, for these reasons, Mr. Ennis asks the Court to modify Condition 7(f) of his bond to permit him to travel to the Northern District of West Virginia as necessary for work.

Date: August 21, 2024.

Respectfully submitted,

DONALD A. ENNIS

By Counsel

WESLEY P. PAGE
FEDERAL PUBLIC DEFENDER

s/Rachel E. Zimarowski

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